

Exhibit B



Holly Cole <holly@holcombward.com>

RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

1 message

Bryan Ward <bryan.ward@holcombward.com>

Fri, Oct 4, 2024 at 5:28 PM

To: Daniel Vedra <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>, Aaron Wright <aaron@holcombward.com>, Holly Cole <holly@holcombward.com>

Okay. No need to meet unless you want to discuss extension of discovery. When are you available for the deposition?

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel Vedra <dan@vedralaw.com>

Sent: Friday, October 4, 2024 5:21 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Ok we agree.



VEDRA LAW LLC

1444 Blake Street

Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Friday, October 4, 2024 3:04 PM

To: Daniel J. Vedra <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Assuming your witness answers the questions without filibustering this time, we could get it done in 3 hours. If not, it would take longer.

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From: Daniel J. Vedra <dan@vedralaw.com>

Sent: Friday, October 4, 2024 4:52 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: Re: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

How much time?

On Fri, Oct 4, 2024, 2:46 PM Bryan Ward <bryan.ward@holcombward.com> wrote:

For the 30(b)(6) topics, we'd be willing to drop Topics 5, 7, 8, 10, and 13. We'd need testimony on Topics 1 – 4, 6, 9, 11, 12, and 14 -17.

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel Vedra <dan@vedralaw.com>

Sent: Friday, October 4, 2024 4:30 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Bryan:

The only thing that I was prepared to talk about was the 30(b)(6), and all I want to know is what you feel you need to cover in an additional deposition. It seems like you're not prepared to talk about the one thing that we were certain we were going to talk about. If you get me that answer, right now, we can avoid this entire conversation because I will get you an immediate answer.

I am not prepared to talk about the topics you now want to discuss and I don't have the time. I have the time and ability to talk about the 30(b)(6) topics that you're seeking more time on, and if you get me that information, I'll get you an

answer immediately.

I'm available at 3:30 and can talk then, but don't want to take time out of your weekend if you can just get me an answer to the question above.

Dan



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From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Friday, October 4, 2024 2:23 PM

To: Daniel Vedra <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

I'll get back to you on the 30(b)(6) topics. As for the other topics, my intention isn't to meet and confer just prior to going to the court. I just want to continue, by phone, discussions that we've already been having by email. Maybe we'll make more progress by phone.

What time can you have a call: 3:00 or 3:30 Mountain?

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel Vedra <dan@vedralaw.com>

Sent: Friday, October 4, 2024 4:04 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Bryan:

I was asking what 30(b)(6) topics you would need to cover. This is the first that you've stated that you need to confer on the alleged document deficiencies and privilege. Since I was not expecting to have to discuss those topics with you, I won't be discussing them and blindsided by this last-minute request.

Let me know what 30(b)(6) topics you need to cover in an additional deposition, and I'll tell if you we can do that.

Dan



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From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Friday, October 4, 2024 1:56 PM
To: Daniel Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

We're still available at 3:30 Mountain but, if we could push it up to 3:00 Mountain, that would be helpful. I have a 6:00 call (4:00 Mountain), so a 3:00 start would give us some more time to talk. Just let us know if that works. We can call 404-566-9907.

As for topics, we want to cover (1) ACLP Defendants' request to continue the Rule 30(b)(6) deposition of Floyd's of Leadville. In addition, we'd like to discuss (2) the document deficiencies that we've written you about and set a timeline for resolving them; (3) FOL's assertion of privilege over its communications with CMD, both for its own production and the document subpoena to CMD's successor firm; and (4) timing of discovery, as you've noted below.

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel Vedra <dan@vedralaw.com>
Sent: Friday, October 4, 2024 3:07 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Can you just tell me what topics you need to cover and when you're available?

Also, we are going to need more time on discovery.



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From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Thursday, October 3, 2024 3:18 PM

To: Daniel J. Vedra <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

We can talk tomorrow at 3:30 MT. Since that's 5:30 pm our time on a Friday, are you available anytime earlier?

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>


Sent: Thursday, October 3, 2024 4:12 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

I am available tomorrow at 3:30 MT.


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Denver, CO 80202


Office: (303) 937-6540
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From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Wednesday, October 2, 2024 11:46 AM
To: Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: FOL v. ACLP et al. -- Letter and Request for Meet and Confer regarding Rule 30(b)(6) deposition of Floyd's of Leadville

Dan,

Please see the attached correspondence relating to ACLP Defendants' request to continue the Rule 30(b)(6) deposition of Floyd's of Leadville.

Bryan M. Ward


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Atlanta, Georgia 30326
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